

MAY 28 2021

IN THE UNITED STATES DISTRICT COURT

AT BALTIMORE  
CLERK, U.S. DISTRICT COURT  
DISTRICT OF MARYLAND  
DEPUTY

FOR THE DISTRICT OF MARYLAND

BY

Leroy Glen Talley

-against-

Sandow Construction Inc.

**Complaint for Employment  
Discrimination**

Case No.

GLS 21cv 1330**I. The Parties to the Complaint.****A. The Plaintiff**

Leroy G. Talley  
7008 Chain Fern Ct.  
Clinton, MD 20735  
(202) 450-0022  
[talleybiz@aol.com](mailto:talleybiz@aol.com)

**B. The Defendant**

Sandow Construction Inc.  
3610 East Street  
Landover, MD 20785  
(301) 322-1446

**C. The address at which I sought employment or was employed by the defendant is:**

Sandow Construction Inc.  
3610 East Street  
Landover, MD 20785  
(301) 322-1446

**II. Basis for Jurisdiction.**

This action is brought for discrimination in employment pursuant to Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§2000e to 2000e-17 (race, color, gender, religion, national origin); and Age Discrimination in Employment Act of 1967, as codified, 29 U.S.C. §§621 to 634.

**III. Statement of Claim.**

Defendant discriminated against me based on my race, color, national origin and age. My year of birth is 1954. The facts of my case are as described in the Charge of Discrimination filed with the EEOC, Exhibit A, attached).

A. **Age Discrimination.** As listed in Exhibit B, from March 1, 2020 to August 11, 2020, Courtney Braxton, a black Supervisor is 32 years old. He worked a total of 877.5 hours while I worked 408.5 hours.

B. **Race/National Origin.** Delia Nolasco, a 40 year old Latina Supervisor, worked 791 hours for the same period. Anibal Orellana is a 50 year old Latino Supervisor who worked 1,073 hours during that period.

**IV. Exhaustion of Federal Administrative Remedies.**

A. It is my best recollection that I filed a charge with the Equal Employment Opportunity Commission or my Equal Employment Opportunity counselor regarding the defendant's alleged discriminatory conduct on August 11, 2020.

B. The Equal Employment Opportunity Commission issued a Notice of Right to Sue letter, which I received on May 1, 2020, Exhibit C.

C. Since filing my charge of age discrimination with the Equal Employment Opportunity Commission regarding the defendant's alleged discrimination, 60 days or more have elapsed.

**V. Relief.**

Sadow Construction Inc. is a company owned by Ricardo Santiago (Afro-Latino), and Kasmera Santiago-Downey, (Afro-Latina). In February 2020, Andre Downey, General Manager, was in a conversation with me and Courtney Braxton. He explained to us that he had employees that made \$100,000 last year and that's how well the company was doing. I personally grossed approximately \$55,000 that year (2019). Andre pointed out that Anibal Orellana was the employee that made \$100,000. His hours totaled 1,073 while mine was 408.5. The company consistently discriminated against me by placing me on call on a regular basis, which kept me from making the amount other workers in the company made. I have significant experience and my ability to work as much as other supervisors with less experience occurred because of my age and race. The amount of \$20,000 would be fair relief to compensate for the amount of salary lost.

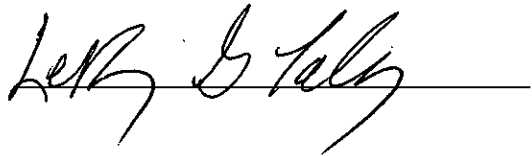
My emotional health and mental health have suffered from worrying about how to deal with the discrimination at work. My rent, credit score and regular bills have been delinquent because of my experience. Punitive damages requested are \$40,000.

**VI. Certification and Closing.**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass cause unnecessarily delay or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: May \_\_, 2021.

A handwritten signature in black ink, appearing to read "Leroy B. Talley", is written over a horizontal line.